

EXHIBIT B

EXHIBIT B

From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>
Sent: Wednesday, September 13, 2023 10:16 AM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; julianne.osborne@lw.com;
SKYRYSEMOOG.LWTEAM@lw.com
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;
Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker
<TBaker@sheppardmullin.com>
Subject: RE: Moog/Skyryse - Motion to Enforce

Kazim,

We wanted to provide an update on the processing of the Google Drive documents into Relativity. We continue to work diligently to move this process forward. As I explained in my email on Monday, FTI is processing approximately 1TB of data that it collected from Google Drive into Relativity. A number of the files included in that data are zip files, which expand during processing. The combination of the total volume and zip file expansion is slowing down the speed at which the data can be processed. Based on the latest update we've received from FTI, we expect it to take until the end of the week at the earliest before that data is fully processed and able to be searched. We will provide another update as soon as we know more.

Based on the communications between Doug Lumish and your team this morning, Skyryse is prepared to proceed with the filing of the joint status report tomorrow. We propose that the parties exchange drafts of their positions at 10am PST tomorrow morning and final drafts at 2pm PST tomorrow afternoon. Please let us know if that schedule works for you.

Thanks,

Russell Mangas

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
D: +1.312.876.7697

From: Mangas, Russell (CH)
Sent: Monday, September 11, 2023 8:31 PM
To: 'Kazim Naqvi' <KNaqvi@sheppardmullin.com>; Osborne, Juli (Bay Area)
<julianne.osborne@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;
Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker
<TBaker@sheppardmullin.com>
Subject: RE: Moog/Skyryse - Motion to Enforce

Hi Kazim:

Skyryse has been working quickly and diligently to move this process forward. You should know that FTI completed collecting the data from Google Drive today. That collection was a time-consuming process because it is almost 1 TB of data and the collection speed is dependent on Google's collection tool (i.e., FTI can't make it go faster). Now FTI is processing and exporting the data into Relativity so it can run searches and provide the hit counts which we need in order to discuss them with you and make sure we

have a workable path forward. For the volume of data at issue, that is typically a several day process. We have asked FTI to dedicate whatever computing resources it can to completing the process before September 14. However, to give the parties sufficient time to digest the hit counts and meet and confer, and hopefully resolve any remaining disputes, we suggest stipulating to extend the September 14 deadline to file a status report to Monday, September 18, and similarly extending the date for the status conference. If Moog agrees, we will prepare that stipulation. Please let us know.

Thanks,

Russell Mangas

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Monday, September 11, 2023 5:17 PM

To: Mangas, Russell (CH) <Russell.Mangas@lw.com>; Osborne, Juli (Bay Area)

<julianne.osborne@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;

Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker

<TBaker@sheppardmullin.com>

Subject: RE: Moog/Skryse - Motion to Enforce

Hi Russell:

I am following up on your e-mail below. Please let us know when Skryse anticipates being able to provide the search term hit count information. As you know, the Parties' joint submission is due on Thursday, and we need sufficient time to review the hit count information and meet and confer as needed.

Thanks,

Kazim

Kazim A. Naqvi

+1 424-288-5336 | direct

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From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>

Sent: Wednesday, September 6, 2023 4:47 PM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; julianne.osborne@lw.com;

SKYRYSEMOOG.LWTEAM@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;

Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skyryse - Motion to Enforce

Counsel:

We have identified the Google Drive documents from the relevant logs and are in the process of collecting and processing them. We have been informed that process will take approximately one week, at which point we will have the ability to run the search term sets and will report back promptly.

We also write in furtherance of and to correct my email of September 2. Regarding Tony Chirico, he was not inadvertently omitted from the last of custodians. Rather, he was never employed by Skyryse, as noted in Skyryse's Amended Answer at Paragraph 143, so his omission from the list of custodians was proper. Nevertheless, Skyryse has confirmed that Mr. Chirico does not have a Skyryse Google Docs account and that there are no access logs for him in Google Docs.

Thanks,

Russell Mangas

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330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
D: +1.312.876.7697

From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Wednesday, September 6, 2023 6:47 PM

To: Mangas, Russell (CH) <Russell.Mangas@lw.com>; Osborne, Juli (Bay Area)

<julianne.osborne@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;

Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skyryse - Motion to Enforce

Counsel:

I am following up on the below e-mail. Please promptly advise if Skyryse has obtained updated search term data and hit reports for Google Drive, as discussed below.

Thanks,
Kazim

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From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>

Sent: Saturday, September 2, 2023 8:42 AM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; julianne.osborne@lw.com; SKYRYSEMOOG.LWTEAM@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skyryse - Motion to Enforce

Kazim,

This email responds to both your August 31 and two September 1 emails.

Raithel Laptop:

We disagree with your contention that Skyryse has not provided a complete image of Mr. Raithel's laptop. To the contrary, Skyryse has provided the most complete image that could be made with the imaging tools available. Nevertheless, consistent with our discussion today, we have emailed iDS to determine whether it has additional ideas on how to perform the imaging and either have FTI perform the imaging or iDS perform it if it is possible to overcome the previously mentioned technological limitations. We will keep you looped into those communications.

Google Drive:

FTI is in the process of determining what is involved in exporting the documents identified in the log files for the Custodians, including the number and burden involved in doing so. As noted on the call, the set of log files from which documents are being identified include both recent logs as well as historical logs from April 2022. We should know more about the volume of data by early next week. As we explained on the call today, assuming the burden of exporting that data is not too great, we understand the parties agree that FTI will export it into Relativity and perform searches, including of document metadata, using an agreed set of search terms. Skyryse would then perform a relevance and privilege review of the hits. It is unclear what standard Moog purports to invoke by referring to a "broadest possible approach to relevance," but Skyryse can confirm that its relevance review will be conducted consistent with its obligations under the rules.

Regarding the list of custodians, we appreciate your review of the list and identifying that Tony Chirico was inadvertently omitted. We will include him in the list of Custodians.

Search Terms:

We disagree that reviewing over 84,000 documents is proportional to the needs of the case. To the contrary, we believe Judge Wu was receptive to Skyryse's proposal that would still result in a search using well over 400 of Moog's search terms. We remain confident that position would prevail if the parties cannot resolve the dispute. Nevertheless, we agreed to table the dispute for now. Assuming it is not too burdensome to export the documents on the Custodians' files logs, we will re-run the search terms as proposed in your August 24th email and report the hit counts. Both sides can then evaluate

whether the resulting counts are reasonable and proportional. We expect we will be able to give you an update on when we can provide that hit count to you by next week as well, but it is dependent on the analysis regarding the Google Drive files described above.

Thanks,

Russell Mangas

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330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Friday, September 1, 2023 4:31 PM

To: Osborne, Juli (Bay Area) <julianne.osborne@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skyryse - Motion to Enforce

Counsel:

I wanted to follow up on one issue. We now see that Juli's list of "Custodians" in her August 30 e-mail does not include Tony Chirico as a former Moog employee. Mr. Chirico is expressly identified in Paragraph 143 of Moog's Amended Complaint as a former Moog employee who went to Skyryse. Juli's e-mail referred to Page 6 of my June 20 letter, but that letter doesn't specifically identify the former Moog employees, only the other "Skyryse employees" at issue.

Moog will require that the files accessed by Tony Chirico also be made available for searching with Moog's search terms. Please confirm.

Thank you,
Kazim

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From: Kazim Naqvi

Sent: Friday, September 1, 2023 11:59 AM

To: 'julianne.osborne@lw.com' <julianne.osborne@lw.com>; 'SKYRYSEMOOG.LWTEAM@lw.com' <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skryse - Motion to Enforce

Joe and Team:

Thank you for conferring today. This briefly summarizes our discussion.

For the Reid Raithel laptop, we agreed that FTI would reach out to iDS promptly to discuss iDS's ability to image Mr. Raithel's laptop, and you agreed to keep us in the loop. Assuming iDS can perform the imaging, we still request that the computer be delivered by September 8. Or, if iDS instructs FTI on how to perform the imaging, we still request that the image be produced to iDS by September 8. If iDS cannot perform the imaging or provide instructions on how to do it properly, then we can revisit and further confer.

On Google Drive and search terms, we are generally in alignment as to process. You advised that FTI cannot generate updated search term hit counts until it exports and processes all the files reflected in the File Logs for the Custodians. You don't expect that process to take a very long time, but we agreed that you would check with FTI and provide us with a time estimate to complete that process when available.

Upon receipt of updated search term hit counts, we can schedule another call to address any outstanding issues, if any.

Thank you and have a nice weekend.

Best,
Kazim

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From: Kazim Naqvi

Sent: Thursday, August 31, 2023 5:08 PM

To: 'julianne.osborne@lw.com' <julianne.osborne@lw.com>; SKYRYSEMOOG.LWTEAM@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skryse - Motion to Enforce

Juli:

In advance of our meet and confer call tomorrow, please find below Moog's positions on the outstanding issues raised in your e-mail.

Reid Raithel Laptop:

Moog has had no *ex parte* communications with iDS regarding Mr. Raithel's laptop or iDS' ability to image a Mac. Rather, it is our expert's understanding that iDS has the capability to provide a complete image of Mr. Raithel's Mac laptop.

We do not object to FTI discussing directly with iDS the imaging of Mr. Raithel's Mac laptop. But, our demand remains the same. We stand by our September 8 deadline for Skyrise to either produce a complete image, or instead to provide the physical laptop to iDS for imaging. This is in line with the timeline set forth in the Court's directives, and we are not prepared to allow Skyrise to cause any further delay. The Court ordered a complete image to be provided to iDS a month ago, and Moog still does not have access to one.

Google Drive:

We are generally agreeable to Skyrise's proposal, which we understand to be the following:

1. FTI will export all documents from Google Drive identified on the log files as having been accessed by the Custodians.
2. The metadata for all these documents will be searchable in the first instance.
3. Skyrise will apply the agreed upon list of search terms and produce relevant, non-privileged documents.

We previously discussed on a meet and confer Skyrise's approach to determining relevance. Mr. Zahoory assured us that Skyrise would take the broadest possible approach to relevance, and if a document has any relation to flight control, it would be produced. The example provided of a type of document that would be excluded from production was a political e-mail referencing the "Democratic Platform."

If any of the foregoing is incorrect, please advise. We do, however, take issue with Skyrise's caveat: "assuming the resulting number of hits is reasonable." Either the Parties have an agreement on all search terms applied to Google Drive or not. From our review, the resulting search term hits across all of Google Drive (approximately 84,000) is proportional to the needs of the case. And, it is our assumption that the resulting search term hits from the subset of Google Drive that only the Custodians accessed (even if including hits on metadata) would result in a lower volume.

Search Terms:

Moog is not prepared to remove or modify any of the 10 search terms identified in the e-mail below, especially because they would now be run across a subset of the entire Google Drive repository.

Our position is that the search terms applied across all of Google Drive, resulting in approximately 84,000 hits, is proportional and not unduly burdensome. But, given that Moog agrees in principle to Skyrise's searching methodology in connection with the Custodians, we request that FTI provide

updated search term hit numbers based on running Moog's search terms through the files accessed by the Custodians (and the metadata). The aggregate number would likely be less than 84,000, and the numbers for individual search terms would ostensibly be less than what was reported before. Please provide those updated hit counts as soon as possible.

Skyryse's statement that the 10 search terms at issue "are generic or commonly used, industry standard-terms that are in no way targeted to identify 'relevant' material" is also not well taken. For example, "AMP" is the name of a Moog flight control program that was misappropriated by Defendants. As another example, "PSAC" is the name of software processing documents referenced in detail in Moog's Motion to Enforce, demonstrating that they were derived from Moog documents. These terms are targeted, and the resulting volume is not unduly burdensome.

We look forward to discussing these issues further tomorrow.

Thanks,
Kazim

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From: julianne.osborne@lw.com <julianne.osborne@lw.com>
Sent: Wednesday, August 30, 2023 5:04 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;
Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker
<TBaker@sheppardmullin.com>
Subject: RE: Moog/Skyryse - Motion to Enforce

Hi Kazim,

We have now received additional information from FTI and provide the following responses to your August 24 email:

Raithel Laptop

We are not aware that Moog has discussed iDS's ability to image a Mac with them. In any case, does Moog object to Skyryse and its vendor, FTI, reaching out to iDS directly to discuss how, if at all, iDS is able to image Macs with the configuration Mr. Raithel's laptop has? If iDS has an approach that works, we can see whether FTI is able to use that method to image Mr. Raithel's laptop.

Google Drive

Skyryse has worked with FTI to find a solution for searching the Google Drive metadata for the relevant custodians. As you are aware, Judge Wu found that it was reasonable for Skyryse to run the Google Drive searches across the materials “accessed by Hummingbird personnel, former Moog employees, or certain Skyryse personnel.” Dkt. 564 at 7. We understand that list to be the individuals you identified on page 6 of your June 20, 2023 letter, also listed below (the “Custodians”). We have asked FTI to export all documents from Google Drive identified on the log files as having been accessed by the Custodians. Once exported to Relativity, the metadata of these documents will be searchable. Skyryse will then run the agreed list of search terms across all these documents and their metadata and, assuming the resulting number of hits is reasonable, will perform a relevance and privilege review of the hits.

We believe this solution accomplishes both parties’ objectives. By exporting *all* documents from the log files for search and review, it provides Moog with more data than Moog requested and saves Moog time not having to review the log files. It also alleviates Skyryse’s concern with producing its entire Google Drive log files, which contain sensitive business information, much of it not relevant to this matter. Please let us know if you would like to discuss.

Search Terms

FTI has used the modifications you proposed to re-run searches across Google Drive and Git. Those searches yielded 84,000 documents (but keep in mind that this does not include the additional documents to be exported from the log files, as proposed above). Reviewing this volume of data is unduly burdensome and not proportional to the needs of the case. Moog has not responded to Skyryse’s proposal to drop the ten terms below, which are generic or commonly used, industry standard-terms that are in no way targeted to identify “relevant” material, as the Court ordered (Dkt. 564 at 7, 8, 10). Proceeding without these terms would result in approximately 56,000 total documents, which will still require significant time and expense from Skyryse’s team to process and review, but is a more reasonable volume. Unless Moog can propose modifications to these terms to target documents relevant to this case, Skyryse maintains that these ten terms should also be dropped.

1. TS_
2. ETC.
3. AMP
4. SS_
5. TD_
6. CCDL
7. SVN
8. PSAC
9. SDP
10. SDD

We are available to further discuss these issues on Friday before 1 pm Pacific. Please let us know if that works for your team.

Thank you,
Juli

The Custodians:

Hummingbird Employees

- Any individuals with “@hummingbird-aero.com” within their email domain

Former Moog Employees

- Alan Lee
- John Stafford
- Sathya Achar
- Mario Brenes
- Lawrence Chow
- Cynthia Le
- Tri Dao
- Reid Raithel
- Paul Kapaun
- Nigel Cranwell
- Gonzalo Rey
- Eric Chung
- Tim Baptist
- Dan Gunderson
- Misook Kim
- Santiago Correa-Mejia
- Vic Nicholas
- Alin Pilkington
- Chi Hsin Alex Wang
- Derek Shiells
- Lori Bird

Other Skyryse Employees

- Amir Hallajpour
- Chris Smith
- David Lee
- Diane Le
- Hussein Khimji
- Ian Young
- Stephen Wang
- Ilan Paz
- Glenn Shintaku
- Thusa Dinh

From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Wednesday, August 30, 2023 11:38 AM

To: Osborne, Juli (Bay Area) <julianne.osborne@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>

Subject: RE: Moog/Skyryse - Motion to Enforce

Hi Juli:

It has been nearly 48 hours since your e-mail below (and nearly a week since my initial e-mail), and we still have not received a substantive response. The next joint report is due in 15 days, and to the extent any meet and confer is necessary, we need to begin that process now. Please let us know Skyrise's positions promptly.

Thank you,
Kazim

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KNaqvi@sheppardmullin.com | [Bio](#)

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From: julianne.osborne@lw.com <julianne.osborne@lw.com>
Sent: Monday, August 28, 2023 1:42 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;
Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker
<TBaker@sheppardmullin.com>
Subject: RE: Moog/Skyrise - Motion to Enforce

Hi Kazim,

We are still working on a response to the proposal you sent. While we are still waiting for some data from our e-discovery vendor, we expect to respond substantively soon. To the extent further discussion would be helpful, we'll include some proposed times for a meet and confer in our response.

Thanks,
Juli

From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Monday, August 28, 2023 11:29 AM
To: #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;
Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker
<TBaker@sheppardmullin.com>
Subject: RE: Moog/Skyrise - Motion to Enforce

Counsel:

I am following up on the below e-mail, which has not received a response. Please advise.

Thank you,
Kazim

Kazim A. Naqvi

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From: Kazim Naqvi

Sent: Thursday, August 24, 2023 3:47 PM

To: 'SKYRYSEMOOG.LWTEAM@lw.com' <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>;

Lai Yip <LYip@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; Tyler Baker Esq.

(<tbaker@sheppardmullin.com>) <TBaker@sheppardmullin.com>

Subject: Moog/Skyryse - Motion to Enforce

Counsel:

I am writing to follow up on the hearing this morning and the Court's directives set forth in the attached document. I provide below Moog's positions and proposals on the three outstanding issues, consistent with Judge Wu's directives.

Regarding the Reid Raithel laptop, consistent with Judge Wu's directives on page 3 of the attached, we request that Skyryse re-image Mr. Raithel's laptop and produce the current, complete image to iDS by September 8. If Skyryse is unable to provide a complete, current image (due to any alleged technical issue or otherwise), then we demand that Skyryse send Mr. Raithel's physical laptop to iDS on or before September 8, such that iDS can complete the imaging. It is our understanding that obtaining a complete image of Mr. Raithel's laptop (notwithstanding the alleged technical issues conveyed by Skyryse) is readily doable, and iDS has the expertise to complete that task.

Regarding Google Drive, consistent with Judge Wu's directives on page 3 of the attached, we request that:

- By September 1, Skyryse advise if it has been able to find a solution such that it can search metadata through Google Drive without having to process the entire repository.
- If Skyryse cannot provide such a confirmation, then by September 15, Skyryse produce the file logs for each of the individuals at issue (Hummingbird personnel, former Moog personnel, and other identified Skyryse personnel) so that Moog can review and request production of particular files. To be clear, and as clarified to the Court today, Moog only seeks the production of file logs which list the file names accessed by the individuals in question (and not the contents of any such files). After receipt of such logs, Moog can request production of certain files. If Skyryse has any objections to producing such documents, it can assert those objections and the Parties can then meet and confer in the ordinary course.

- Additionally, Skyryse will run the final set of search terms against all of the contents and file names of the files in the Google Drive Account. Skyryse shall begin producing responsive documents on a rolling basis on September 8, with the production to be completed by October 27.

Regarding search terms, Moog is prepared to make the following proposals (many of which were already made before the Parties submitted the Joint Report):

- Regarding “Platform,” Moog has already agreed to withdraw “Platform” as a search term from the Git and Polarion repositories. Moog is only requesting that “Platform” be run across Google Drive. Per Juli’s August 11 e-mail (attached), this narrowed search term results in only 8,547 hits in Google Drive, with only 8 unique documents. This is a substantial reduction from the inaccurate number of 158,600 hits that Skyryse represented on Page 20 of the Joint Report.
- Regarding “Git,” Moog has already agreed to narrow this term to (“Git” and “guide”) across all repositories. Per Juli’s August 11 e-mail, this narrowed search term results in only 651 total hits, and only 43 unique hits in Google Drive.
- Regarding “Jira,” Moog has already agreed to narrow this term to (“Jira” and “guide”) across all repositories. Per Juli’s August 11 e-mail, this narrowed search term results in only 754 total hits, and only 137 unique hits in Google Drive.
- To reach a mutually agreeable solution, Moog is also prepared to drop the search terms “IO_” and “API_” from all repositories.

Based on the foregoing, Moog has substantially narrowed or dropped the 4 search terms that Skyryse represents provide the largest volume of search term hits, as well as Jira. After these revisions, based on Skyryse’s chart on Page 20 of the joint report, no search term will result in hits over 7,567 (which does not even account for unique documents). And, our understanding is that the total volume of documents that Skyryse would have to review would be much less than 113,000 after removing “IO_” and “API_”.

Please confirm your agreements to the foregoing. If Skyryse would like to confer, please provide your availability on Monday between 10 AM to Noon and 2-4 PM, and Tuesday between 9-11 AM and 2-4 PM PT.

Thank you,
Kazim

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